

12:46 pm, May 21 2020

FILED \_\_\_\_\_ ENTERED \_\_\_\_\_  
LOGGED \_\_\_\_\_ RECEIVED  
AT BALTIMORE  
CLERK, U.S. DISTRICT COURT  
DISTRICT OF MARYLAND  
BY \_\_\_\_\_ Deputy**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT**

I, Special Agent Benjamin Parker of the Bureau of Alcohol, Tobacco, Firearms & Explosives (“ATF”), being duly sworn, deposes and states as follow in support of a criminal complaint against and arrest warrant for Alfred COSTLEY, year of birth 1988.

**AFFIANT BACKGROUND**

1. I am an investigative law enforcement officer of the United States within the meaning of Section 2510(7) of Title 18, United States Code, that is, an officer of the United States who is empowered by law to conduct investigations of and to make arrests for offenses enumerated in Section 2516 of Title 18.

2. Specifically, I am a Special Agent with the ATF and have been so employed since 2015. I am currently assigned to the Baltimore Field Division, Group III, a group charged with investigating controlled substance and firearm violations. As a Special Agent, I have participated in complex investigations focusing on controlled dangerous substance (“CDS”) trafficking, gangs, and illegal firearms. I have conducted covert surveillance of suspected CDS traffickers, interviewed individuals involved in gangs and the CDS trafficking trade, participated in multiple Title III wiretap investigations (both as a monitor and member of surveillance teams), and participated in the execution of state and federal search and arrest warrants involving CDS traffickers, firearms, and violent offenders.

3. I submit this Affidavit for the limited purpose of establishing probable cause to support the issuance of a Criminal Complaint charging Alfred COSTLEY with violations of Title 18 U.S.C. § 922(g)(1), Possession of a Firearm and Ammunition by a Prohibited Person. Because I submit this affidavit for the limited purpose of establishing probable cause to support the issuance

of a Criminal Complaint, it only contains a summary of relevant facts. I have not included every fact known to me concerning the entities, individuals, and the events described in this Affidavit.

4. All information contained in this Affidavit is either personally known to me, has been related to me by other law enforcement officers, and/or has been obtained from records, documents, and other sources gathered during this investigation.

#### **PROBABLE CAUSE**

5. In November 2019, the ATF, the Baltimore Police Department (“BPD”), and the Prince George’s County Police Department (“PGPD”) conducted an investigation into COSTLEY involving the unlawful possession of a stolen firearm and stolen automobile.

6. On November 18, 2019, at 7:00 pm, a customer purchased a new 2018 black Infinity Q60 from the Passport Infiniti car dealership located in Prince George’s County. The next day, after the customer had already departed with the car, the dealership learned that the customer had purchased the car with a forged cashier check and provided fictitious documents in support of the financing.

7. Upon learning that the vehicle had been obtained by fraud, the dealership contacted the PGPD Auto Theft Unit. PGCD Detectives and dealership employees, with the aid of the vehicle manufacturer, activated a global positioning system (GPS) that had been installed in the stolen Infiniti and tracked its location. GPS data revealed the vehicle was parked in the area of the 800 block of N. Milton Street, Baltimore, Maryland.

8. PGPD detectives relayed this information to detectives with the BPD Regional Auto Theft Team, who responded at approximately 9:15 pm on November 19, 2019, and located the stolen vehicle in that area. Although the car was parked and unoccupied, the engine was

running and some of the car lights were on. After approximately 20 minutes, an individual, later identified as COSTLEY, entered the driver's seat of the car.

9. BPD detectives approached COSTLEY, and instructed him to step out of the vehicle. They conducted a pat down of COSTLEY, and recovered a handgun from COSTLEY's right jacket pocket, specifically, a Ruger Model SP101 .357 Magnum revolver, bearing serial number 57594896, loaded with five .357 magnum cartridges. Upon locating the firearm, detectives stated "We got a gun." and Costley responded, "Yup, I'm in the City. That's just what it is." The firearm had been reported as stolen. The recovered firearm and ammunition were in and affecting commerce.

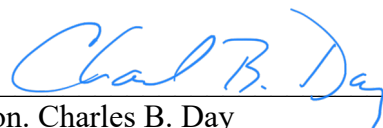
10. Costley knowingly has previously been convicted of a crime punishable imprisonment for a term exceeding one year.

11. Based on the foregoing facts, I believe probable cause exists to support the issuance of a Criminal Complaint and arrest warrant charging Alfred COSTLEY with Possession of a Firearm and Ammunition by a Prohibited Person, in violation of Title 18 U.S.C. § 922(g)(1).

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Special Agent Benjamin Parker, ATF

Affidavit submitted by email and attested to me as true and accurate by telephone consistent with Fed. R. Crim. P. 4.1 and 4(d) this 21<sup>st</sup> day of May, 2020

  
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Hon. Charles B. Day  
United States Magistrate Judge  
District of Maryland